

Wellington Underwater Club Submission to WCC

Tātou ki Uta - Coastal Reserves Management Plan

Tēna koutou, and thank you for the opportunity to feed back on the 2025 Tātou ki Uta - Coastal Reserves Management Plan. This submission is made on behalf of the Wellington Underwater Club.

Wellington Underwater Club is one of Aotearoa New Zealand's oldest active underwater/dive clubs, looking forward to celebrating our 75th anniversary in 2026. In 2024 the club reincorporated according to the 2022 Incorporated Societies legislation, with a new constitution which describes our purposes as follows;

- To benefit the community by supporting the underwater exploration, promotion, and protection of the undersea environment of Te Whanganui-a-Tara, Wellington, and the surrounding region
- To promote all aspects of the amateur sport of diving, and its attendant activities throughout Aotearoa New Zealand
- To promote and participate in the protection of, and scientific study of, the marine environment, marine life, marine fish and animals, and their habitat

We make this submission on the grounds of having this mandate to protect, and support the protection of, our undersea environment in mind.

Firstly, we wish to make it clear that broadly speaking, **we are in strong support of the plan.** Our submission pertains to aspects which we believe can be further strengthened to protect the coastal marine environment, uphold the uniqueness of our taonga marine coastal areas, and educate those who don't get to experience these directly. While not particularly known as a dive destination, Wellington's divers understand that our coastal marine environment is particularly varied and vibrant, extremely easily accessed, and incorporates a wide range of ecosystems and species, many of which are under threat. While we acknowledge that the health of our undersea environment is not strictly within the remit of the proposed Coastal Reserves plan (rather being managed by Greater Wellington Regional Council under the Key Native Ecosystems Program,) as divers we recognise that our coastal marine environment is entirely enmeshed with our behaviours on and use of the land, both in the immediate vicinity and further inland. Our feedback is, therefore, centred on principles of protection and education, which we believe to be in line with the goals expressed in the document. We believe the proposed plan can be further strengthened by following these recommendations.

Values

Value 2

The Wellington Underwater Club wishes to note our strong support for all the values expressed in the proposed plan; there are several pathways about which we will provide specific feedback. However we do wish to note that the map illustrating Value 2 is missing some important and unique dive and snorkel sites. Given much diving and snorkelling is largely invisible to much of

the community, we propose that the map should highlight more of these diverse and precious dive sites in order to make their importance visible within the document. The additional sites we wish to highlight are as follows;

- **Sirens Rocks (variously known to divers as “The Sirens”, “Mermaid’s Kitchen” and “Brass Monkey”).** This site supports a wide variety of invertebrates, crustaceans, fish and cnidaria within the protection of its narrow rocky north-south channels. The site is an important one for dive training in the region and is one of our most easily accessible sites for diving night and day.
- **Houghton Bay (both the eastern side bay and reef and the rocky reefs of the western side around Elsdon pipe).** The bay features several dive sites, and supports large fish populations and occasional locally rare species such as John Dory and red gurnard in the bay itself, as well as rich and diverse reef ecosystems on either side of the bay. The extensive reef system extending around from Houghton Bay to Princess Bay reaches 18m in depth, and as such, provides our most accessible subtidal reef system, as well as providing another important location for dive training requiring depth beyond that of most of our coastal sites.
- **Breaker Bay, in particular Butterfish Rock,** supports a wider variety of invertebrates than most local dive sites in the narrow crack that bisects the rock along its length, while the bay itself has a significant giant kelp population. Although less frequently dived than other south coast sites, this relates to the challenges of access outside of high tide, and the tendency for significant surge in and around Butterfish Rock; these challenges add to the preciousness of the site, which is much less disturbed by human activity than more accessible sites on the south coast.
- **Māhanga Bay and the south side of Kau Pt** provide various dive sites in a small area. These include the purpose-built tyre reef at the northern end of Māhanga Bay (accessible from Kau Pt) and the remaining mussel ropes and fish farm accessed from the boat ramp. These both support rich crustacean and invertebrate diversity in Māhanga Bay, and are frequently dived with the weed line extending along the sea wall. The now decades-old tyre reef has become home to numerous fish species such as sweep and sea perch not often found in our south coast sites, as well as a wide array of invertebrates including soft corals. Night divers will find that the bay provides an important nursery area for juvenile gurnard, blue cod, tarakihi and leatherjackets, large numbers of Wellington nudibranchs, pipefish and seahorses, none of which are common at the better-known south coast dive sites. Southern reef squid and bobtail squid are common sightings at night, as is our native pygmy octopus. The area is significantly fished, with large amounts of fishing line left to pose a danger to divers and our environment, and marking the area as being important for diving may help to highlight this concern.
- **Shark Bay** supports populations of fish not found elsewhere in the harbour in such number, particularly Pipefish and Ocellate Triplefin. A popular site for night dives due to its easy accessibility, it is also dived for scallops, or when other sites are unsuitable due to high winds and swells.

Value 4

“Tiaki Taiao - Protection and restoration of coastal ecosystems” is of particular relevance to Wellington Underwater Club. In particular we wish to provide some feedback on Pathways 4.1-3, 4.4 and 4.7.

Pathway 4.1 Targeted ecosystem restoration - Marine Coastal Area

Pathway 4.2 Wildlife recovery

Pathway 4.3 Control invasive species

While we recognise that marine protection is not the focus of this plan, we wish to express concern about deteriorating intertidal and subtidal ecosystems as a result of overfishing and rubbish and highlight that these are intrinsically connected with how we manage our coastal margins. We also wish to highlight the invasive nature of kina locally; while kina are a native species, the developing kina barrens both within the harbour, and on the south coast, particularly at the eastern end of Taputeranga Marine Reserve, reflect the insufficient populations of kōura and large fish species such as moki and snapper to control kina numbers. Extensive litter is found in our marine coastal areas. This results from deliberate abandonment of rubbish as well as litter blown from bins, throwing/dumping of glass bottles, and abandoned fishing line (particularly in the harbour in the case of the latter.) Currently much of the restoration of these areas in the form of underwater clean-ups and invasive species culls is the work of volunteers and not-for-profit organisations. Restoration should not purely be the work of those who explore the underwater environment, given most of the causes of harm are land-based. We strongly support council-lead measures such as dedicated funding for underwater clean-up activities and invasive species culls, support for periodic rāhui to support regeneration of our marine ecosystems, and strong measures to prevent water contamination and litter aggregation. In addition we encourage the council to take robust measures to ensure the safety of our seabirds, including completely dog-free areas; we recognise that dogs are important to a great many whānau in the Wellington region, however this need not require dogs to have free range of all our coastal areas; we support numerous dog-free zones in our coastal areas, clear marking/fencing in sensitive areas and robust measures to ensure dog-owners respect the need to protect our vulnerable species and support their roles in our ecosystems.

Pathway 4.4 Strong collaborative relationships for coastal restoration

We identify ourselves as a small community group with an interest in working collaboratively to restore our Marine Coastal Areas. We also wish to note that like many of our local organisations, our members engage in restoration activities entirely voluntarily, and it is beyond the capacity of such volunteers to take responsibility for all the required restoration work to enable our marine coastal ecosystems to thrive. WCC has a valuable role to play in coordinating clean-up activities and supporting volunteers in keeping our Marine Coastal Areas in good health, but should not view these as an alternative to active funding of professional clean-ups.

Pathway 4.7 Sustaining the Coast as a storehouse

We wish to strongly express our support for Action #3, audit of bin design and placement. Salt-related damage to rubbish bins in coastal locations causes failed containment of litter, particularly along the wind and swell-beaten south coast. Much of the rubbish littering our marine coastal areas appears to relate to these failures of containment and irregular emptying of bins in our coastal reserves. Bins must be plentiful, secure, but also frequently emptied to be effective. WUC sees this as an urgent and relatively easily-sorted problem, but also wishes to highlight the importance of targeted education in our coastal reserves about the dangers of litter to our ecosystems.

The remainder of our feedback considers the proposals relating to the various sectors outlined in the Coastal Reserves Plan.

Sector 1 - Te Kopahou (Red Rocks and beyond) -

1.4 Nature-first approach to resilience - Allow unformed coastal route to recede naturally back towards beach driving

Wellington Underwater Club supports this proposal; Parawhero/Red Rocks is a popular dive site, particularly for free divers, but we believe the benefits to the environment of this proposal outweigh the harms, particularly given beach access will be possible with 4WD as at present. In addition we strongly encourage WCC to strengthen wildlife protections by considering dog-free zones along this section of coast.

Sector 2 - Taputeranga

2.3 Protection and restoration of coastal ecosystems

c. Support the protection and enhancement of Taputeranga Marine Reserve by enabling and collaborating with relevant agencies and the community on anti-poaching measures

d. Continue to support efforts to mitigate water contamination risks at Houghton Bay by collaborating with GWRC on stormwater management improvements and addressing historic landfill impacts.

e. Support marine biodiversity initiatives by working with partners such as Mountains to Sea Wellington and Friends of Taputeranga Marine Reserve to explore kelp restoration efforts and enhance natural coastal resilience.

Wellington Underwater Club strongly supports points c, d and e, pertaining to protection of the underwater environment of our taonga, Taputeranga Marine Reserve. Though not within the remit of this plan, we wish to advocate for kina control, bearing in mind that despite its increasingly flourishing ecosystems, Taputeranga Marine Reserve still lacks sufficient numbers of kina predators such as snapper able to control the burgeoning kina population, particularly on the reef between Princess and Houghton Bay.

In addition, we encourage the council to prioritise the Taputeranga Marine Reserve area for improved litter bins and more frequent rubbish collection, as all areas of the reserve are marred by litter to a degree that is beyond the capacity of divers to control, with microplastic debris a particular cause for concern due to being too small for divers to collect and transport back to shore.

Action 10 - Review options for removal or repurposing of the bait house in the context of coastal hazard issues, eq strengthening requirements and lease renewal (medium term 5-7y)

While we recognise that the aquarium in the Bait House is not run or owned by WCC, we wish to register our concern at the possibility of losing this valuable education and storytelling facility should the trust that runs it be unable to find another location. We are not in the position as a club to assess the validity of the claim that there is significant potential harm involved in the Bait House location being retained, but we urge the WCC to consider whether there is benefit in completing earthquake remediation, and/or to WCC providing active support to the aquarium to find an appropriate alternative location, including but not limited to favourable building or land lease conditions. The aquarium is invaluable in terms of building population knowledge, understanding and empathy that is widely lacking for the coastal environment. We cannot protect what we don't know. As such, we believe that supporting the continuing work of the Island Bay Bait House aquarium is key to the success of the Coastal Reserves Plan, in particular Pathway 3.2 "Enrich coastal experiences through storytelling" and 4.2 Wildlife Recovery Management "Raise public awareness and education to reduce human-wildlife conflict."

Sector 4 - Rangitatau (Moa Pt to Breaker Bay)

We are entirely in support of the action points for Rangitatau and have no feedback other than to reemphasise the delicate and valuable underwater ecosystem of Butterfish Rock with its healthy kelp forest (including Giant Kelp), invertebrate and sponge-encrusted walls, and locally uncommon nudibranchs. We believe improved facilities in the form of a toilet block in this sector would be advantageous to those making the most of this special area.

Sector 5 - Te Whanga Rāwhiti (Breaker Bay to Scorching Bay)

Kelp forests in this area and Sector 6 support almost all of Te Whanganui-a-Tara's native seahorse population, and we would like to see that emphasised, as a point of difference from other parts of Wellington, rather than reemphasising paua and kōura. Our Potbellied Seahorses and pipefishes are uncommon along the south coast, making these harbour kelp forest areas critical to their local survival. Local divers note a substantial decrease in seahorse numbers over the past decade as a result of kina barren in Sectors 5 and 6.

Sector 6 - Mātai Moana Coast - Scorching to Evans Bay

As for Sector 5. The western side of this peninsula also has notable differences in underwater life to the peninsula's eastern side.

Action 1 - Provide a new public toilet in this sector

Wellington Underwater Club is entirely supportive of this proposal and believe it will improve accessibility for all Wellingtonians to this stretch of coast.

Action 2 - Investigate whether to retain or remove the old NIWA boat ramp at Māhanga Bay, considering current use, condition, and potential for future education or coastal access.

Māhanga boat ramp provides important access to this water for divers and kayakers who use the area extensively, particularly when Cook Strait conditions make diving on the south coast unfeasible. We strongly encourage WCC to keep the ramp, or at least replace it with stairs down the seawall; the latter option is fine for divers but is limiting for the many kayakers who access our harbour from the Mātai Moana Coast.

Action 4 - Install a mechanism to allow for temporary closures of Massey Road for events and reducing traffic management costs

While we recognise that traffic closures in this area may support the safety of bike and running races, we wish to point out that there are many times in the year where due to sea conditions, Massey Road provides the only option for access to the only diveable locations in the Wellington region. Wellington Underwater Club believes that road closures should not prevent other users of this area from accessing this valuable area and provisions should be put in place to ensure that those wishing to access the coast itself are not restricted from doing so by those simply using coast-adjacent roads. We consider that all closures should be extensively advertised in advance, not only in Wellington City but within the region, and should not prevent all access to the entire peninsula from Shelley Bay to Scorching Bay, as has sometimes been the case. The needs of road users should not entirely prevent access from those trying to access the coast itself.

Action 9 - Investigate reserve classification for the coastal headland between Kau Bay and Mahanga Bay to support long-term protection of its environmental and landscape values.

Wellington Underwater Club supports this proposal, and wishes to note that Kau Pt reserve is important not only as a coastal headland but as the reef structure for the most significant giant kelp forest across both Te Whanga Rāwhiti and Mātai Moana coastal sectors. With this in mind, we believe that the area should also be seen as a valuable area in terms of regeneration of the Marine Coastal Area within the harbour. The area is extensively fished for squid and blue moki. The latter are common to catch in this area but almost never seen by divers, suggesting that the area may be significantly overfished. Abandoned fishing line is a major ecological concern in the sea around the headland, as is rubbish, in particular glass bottles, so adequate rubbish facilities with appropriately frequent rubbish collection should be a priority in this area.

In summary Wellington Underwater Club supports the values and pathways underpinning the proposed Coastal Reserve Management Plan. We support the extensive work consultation underpinning the document and the way it upholds the environment of our Te Whanganui-a-Tara's taonga, our coastal environment, and the centrality of Mana Whenua to its protection. We also believe that the suggestions of our club can further strengthen the plan and highlight the incredible preciousness of our underwater environment, and urge WCC to consider that although that environment is not strictly within your remit, the health of our intertidal and subtidal environments are completely enmeshed with the health of our coastal reserves. This plan is an opportunity to acknowledge that enmeshment, as well as to educate our population about the intertidal and subtidal environments that are invisible to many of them.

Ngā mihi,

Alison Grant (President), submitting on behalf of Wellington Underwater Club

A handwritten signature in black ink, appearing to read 'Alison Grant', with a long horizontal stroke extending to the right.